

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

HONORABLE YOUNG KIM

VS

15 CR 106

BRIAN MADDALENI

MOTION TO EXPAND BAIL

Now comes the defendant, BRIAN MADDALENI, by and through his attorney, KEVIN P. BOLGER, and asks this Court to review the present conditions of bail to allow him to work. In support thereof, the defendant states as follows:

1. The defendant was previously admitted to bail in the above captioned case.
2. There have not been any violations of that bond. As a condition of the bond he is on electronic home monitoring with permission to work.
3. Defendant has a limousine company in which he must work varied hours seven days a week. Often times these "pick ups" or "trips" are on as little as three hour notice. His pretrial Officer Krista Greene requires 24 hour notice. He is unable to service most of his client's and has to refer them to other companies and drivers and therefore loose the income. Not only does he not receive a referral, but in some cases they charge more and he pays the difference rather than losing the client.
4. Defendant would like permission to expand his bond to allow him to be removed from the bracelet.
5. If allowed he would provide pretrial with proof of his activities by keeping a log of all his trips.

Wherefore the defendant requests that his bail be modified to allow him to work. All other conditions should remain in effect.

Respectfully submitted,

KEVIN P. BOLGER

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